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Attorney for Material Witnesses

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA Plaintiff v. MARICELA GONZALEZ-TREJO (1) MIGUEL ROMERO-RIOS (2) Defendants	Criminal Case No.08cr0545LAB NOTICE OF MOTION; MOTION FOR VIDEOTAPE DEPOSITIONS, AND RELEASE OF MATERIAL WITNESSES; Hearing Date: April 15, 2008 Time: 1:30 p.m. Court: A Judge: Hon. Anthony J. Battaglia

TO KAREN P. HEWITT, UNTIED STATES ATTORNEY, CARLOS ARGUELLO, ASSISTANT UNITED STATES ATTORNEY, TIMOTHY SCOTT, ATTORNEY FOR DEFENDANT, MARICELA GONZALEZ-TREJO,AND MICHELLE BETANCOURT, ATTORNEY FOR DEFENDANT, MIGUEL ROMERO RIOS.

PLEASE TAKE NOTICE that on April 15, 2008, at 1:30 P.m., counsel will move this court for an order to take the depositions of the material witnesses, LUIS ALBERTO OCHOA-CASTILLO, and G.C-G.(minor)

MOTION

LUIS ALBERTO OCHOA-CASTILLO, and G.C-G.(minor), through thier counsel, CIRO HERNANDEZ, and pursuant to Fed. R. Crim. P. Rule 15, 8 U.S.C Section 1324 (d) , 18 U.S.C. Section 3144, and 18 U.S.C. Section 3142, hereby moves this court for an order to take their depositions by videotape.

This motion is based upon the accompanying points and authorities, the records in the above-entitled case and all matters submitted to the court prior to the determination of this motion.

Dated: March 25, 2008

/S/ Ciro Hernandez
CIRO HERNANDEZ
Attorney for material witnesses